

# EXHIBIT 8

REDACTED PURSUANT TO  
APRIL 25, 2019 ORDER (ECF NO. 477)

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA**

**ELIZABETH SINES et al.,  
Plaintiff**

**vs.**

**JASON KESSLER et al.,  
Defendant**

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**CASE NO: 3:17cv00072  
(J. Moon, Magistrate J. Hoppe)**

**DEFENDANT Traditionalist Worker Party's RESPONSES TO PLAINTIFF'S FIRST  
INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS**

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Now comes defendant Traditionalist Worker Party and responds to Plaintiff's first set of Interrogatories and Request for Documents as follows:

**I. DISCOVERY REQUESTS**

1. Identify all means of communication used by you to communicate concerning the Events, whether before, during, or after the Events, and for each means of communication, identify all names, aliases, e-mail addresses, phone numbers, and Social Media Handles you used in connection with such communications, including the 18-digit account identifier associated with any Discord account used by You. Means of communications include, but are not limited to, telephone calls, in-person meetings, and all means of electronic communication including, for example, Social Media, email, SMS messages, podcasts, and online video.

**ANSWER:**

The [REDACTED] Facebook page was deleted by Facebook, Inc.

The [REDACTED] Twitter account was deleted by Twitter, Inc.

The [REDACTED] MailChimp account was deleted by MailChimp, Inc. Mailchimp would have contained Charlottesville Registration Info for TWP attendees. I do not know if it is possible to recover this info from MailChimp.

TWP has, at times, used Signal to communicate. Signal automatically scrubs messages sent using the service.

TWP no longer has access to Discord but all responsive TWP information from Discord been published at unicornriot.ninja

2. Identify any “channel” or “server” on Discord to which you had access.

**ANSWER: See above answer to #1.**

3. Identify all persons (natural or non-natural) with whom you communicated concerning the Events, whether before, during, or after the Events.

**ANSWER: TWP communicated through Matthew Heimbach, Matthew Parrott, and [REDACTED].**

4. Identify all Electronic Devices used by you to communicate concerning the Events, whether before, during, or after the Events.

**ANSWER: Communication was handled as described above in #3. Specific device information I unknown to TWP at this time except as stated above.**

## **II. DOCUMENT REQUESTS**

**General Response:** TWP objects to all below document requests on the grounds that to comply without third party permission or a court order violates the Stored Communications Act 18 USC §2701 et seq.

1. All Documents and Communications concerning the Events, including without limitation all documents and communications:

- i. concerning any preparation, planning, transportation to, or coordination for, the Events, including receipts, bills and credit card statements reflecting costs for transportation, lodging, apparel, gear, or any other material purchased for the Events;
- ii. concerning any instructions or coordination relating to the Events, including security details, what to wear, what to bring, when to meet, where to meet, what to say, and any other logistical information or arrangements;
- iii. that are Social Media documents concerning the Events;
- iv. you created during the Events, including Social Media, text messages, video, and photographs;
- v. concerning African Americans, Jewish individuals, or other religious, racial, or ethnic minorities that relate in any way to the Events;
- vi. concerning any statement or action attributed to You in the Amended Complaint; or
- vii. concerning any allegation of an altercation, violent act, injury, or instance of intimidation

or harassment that occurred during the Rally, including but not limited to James Fields' vehicular incident; or

viii. concerning any funding of the Events, including for transportation, housing, food, weapons, uniforms, signage, tiki torches, or other materials or services used in connection with the Events (or the planning thereof)..

**ANSWER: See above objection.**

2. All Documents and Communications concerning events, meetings, rallies, conferences, or conversations held prior to the Events that relate to the Events in any way.

**ANSWER: See above objection.**

3. All Documents concerning and all Communications concerning or with East Coast Knights of the Ku Klux Klan (or East Coast Knights of the True Invisible Empire), Fraternal Order of the AltKnights, Identity Europa (or Identity Evropa), League of the South, Loyal White Knights of the Ku Klux Klan (or Loyal White Knights Church of the Invisible Empire Inc.), Moonbase Holdings, LLC, Nationalist Socialist Movement, Nationalist Front (or Aryan National Alliance), Traditionalist Worker Party, Vanguard America, or any such other social group or organization that has as part of its agenda a racial, religious, or ethnic objective.

**ANSWER: See above objection.**

4. All Documents and Communications concerning violence, intimidation, or harassment of Persons on the basis of race, religion, or ethnicity, including but not limited to, ethnic cleansing, white genocide, a white ethno-state, or any other form of large or small scale violence.

**ANSWER: See above objection.**

5. For any Social Media account You had from January 1, 2015, to the present: i. Documents and Communication sufficient to show the account home page, and all uses of Social Media for that account that reference or concern the Events or Defendants in any way. ii. Documents and Communication sufficient to show all Your "friends" and/or "social connections" maintained on Your account, including their names, addresses, and social network usernames or handles.

**ANSWER: See above objection.**

6. All Documents concerning and all Communications concerning or with any Plaintiff or

Defendant (other than You) named in the Amended Complaint, and any other Person who attended, planned or was involved in the Events.

**ANSWER: See above objection.**

7. All Documents and Communications concerning any lawsuits, claims of violence, or arrests relating to or arising out of racially, ethnically, or religiously motivated conduct by You or any Defendant named in the Amended Complaint.

**ANSWER: See above objection.**

8. All Documents and Communications concerning the steps you have taken to preserve Documents and Communications relevant to the lawsuit, including the Documents and Communications responsive to these Requests.

**ANSWER: No special steps were taken.**

Respectfully Submitted and as to Objections:

s/ James E. Kolenich PHV

James E. Kolenich

Ohio Bar Number: 0077084

**Attorney for TWP**

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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on **April 18, 2018** **via email** upon: Mr. Yotam Barkai, Esq., Ms. Sequin Strohmeier Esq. **Attorneys for Plaintiffs** as follows: email: [YBarkai@bsfilp.com](mailto:YBarkai@bsfilp.com); [sstrohmeier@kaplanandcompany.com](mailto:sstrohmeier@kaplanandcompany.com)

s/ James E. Kolenich PHV

James E. Kolenich

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**VERIFICATION**

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I have reviewed the attached responses to discovery and verify that they are true and correct to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 18, 2018.



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Tony Hovater for TWP